Alan D. Tetreault Highway Surveyor



TOWN OF MENDON

HIGHWAY DEPARTMENT

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To the Whom it May Concern,

The Mendon Highway Department was issued a MS4 permit in 2003. Since the new permit regulations are under review, I took an opportunity to familiarize myself with the proposal, and also had a review completed by a professional in the field.

I strongly urge that the EPA review these regulations for feasibility and practicality. Overall, the cost to implement the more stringent requirements of the MS4 permits is extraordinary, and in my opinion, burdens cities and towns beyond where we can reasonably expect to afford. The proposed actions to be taken have surpassed what the town can provide without the use of expensive, professional skill. The Town of Mendon specifically, could be obligated to spend up to \$100,000 within the first two years of this permit. At the end of the five-year period that the permit covers, the town could potentially spend more than one million dollars. Mendon, like many other towns in Massachusetts, is struggling with budget shortages and proposition 2 ½ overrides that stretch every resource to the limit. Given the limited impact that this town has on surrounding waterways, this onerous obligation, both in money and manpower, is unworkable.

In my opinion, a much better way of handling stormwater issues would be to face it proactively. There are many tools available to minimize or prevent stormwater pollution, including low impact development techniques, optional infrastructure retrofits, and more aggressive use of alternative land design for new construction. The Town should not be mandated to spend hundreds of thousands of dollars on methods to clean up the very limited amount of polluted or impaired waters in the Town. With some focus, we could stop those same waters from becoming more 'impaired', and in the case of low impact development, the cost to reduce pollution is more evenly spread between the municipality, developers, and builders.

The Town of Mendon enjoys a number of natural resources, including our rivers, streams, and wetlands. We are fortunate in this regard, but I believe some semblance of reason must be adopted to determine the factual degree of stormwater pollution, the relative impact that this town has (and has had) on that pollution, and the types of solutions that are realistic, practical, and affordable. The proposed permit requirements and ensuing regulations will only burden this town with financial constraints that are unreal and unnecessary. Again, a more prudent, practical solution is to address the stormwater pollution issues at the head of the problem, rather than after the fact.

If you have any questions, please call.

Sincerely,

ALAN D. TETREAULT Highway Surveyor